

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

DAVID REID, et al.,

Defendants.

Case No.: CR05-1849 JH

(EXPEDITED RULING REQUESTED)

**UNOPPOSED MOTION BY DEFENDANT DAVID REID
TO BE PERMITTED TO FLY AN AIRCRAFT**

Defendant, David Reid, by and through undersigned counsel, hereby moves this Honorable Court to permit him to fly an aircraft in Newberg, Oregon on June 2, 2006, June 3, 2006 and June 4, 2006 for approximately one (1) hour each. The purpose of the flight is to photograph activities taking place in the Newberg area for Sandy Dormer, owner of Dormer's Screenprinting & Sports. The grounds for this Motion are:

1. Pursuant to the current terms and conditions of release, Mr. Reid is prohibited from flying an aircraft.

2. Mr. Reid and undersigned counsel were before this Honorable Court on January 5, 2006 at 10:00 a.m. for oral argument on his *Motion to Modify Conditions of Release*. At that hearing, the Court ruled that Mr. Reid would not be permitted to fly an aircraft with the caveat that if Mr. Reid submitted a proper motion regarding future flights, the Court would consider it on a "piece-mail" basis.

3. Mr. Reid has the opportunity to earn money by flying an aircraft over the Newberg area on June 2, 2006, June 3, 2006 and June 4, 2006. Mr. Reid has received such an offer from Dormer's Screenprinting & Sports. According to a letter from Dormer's Screenprinting Owner, Sandy Dormer, the flights would "originate from the Newberg Airport and return to the same. The flight should take approximately one hour and will be conducted over the local area. The purpose of the flight is to photograph activities taking place in the Newberg area." A true and accurate copy of Ms. Dormer's correspondence is attached hereto as Exhibit "A."

4. Undersigned counsel has contacted Mr. Reid's assigned Pre-trial Services Agency Officer in Arizona, Suzette Frisby, and Ms. Frisby stated that she has no objection to Mr. Reid flying an aircraft on June 2nd, 3rd or 4th, so long as she receives proof of payment to Mr. Reid for said flights from Dormer's Screenprinting.

5. Undersigned counsel has contacted his assigned Pre-trial Services Agency Office in New Mexico, Nick Romero, and Mr. Romero stated that he has no objection to Mr. Reid flying an aircraft on June 2nd, 3rd or 4th, so long as he receives proof of payment to Mr. Reid for said flights from Dormer's Screenprinting.

6. Undersigned counsel has contacted Assistant United States Attorney James Braun and Mr. Braun has stated he has no objection to Mr. Reid flying an aircraft on June 2nd, 3rd or 4th.

Based on the foregoing, Mr. Reid requests this Honorable Court enter an Order permitting him fly an aircraft on June 2, 2006, June 3, 2006 and June 4, 2006 to fulfill an obligation with Dormer's Screenprinting & Sports.

RESPECTFULLY SUBMITTED this 1st day of June, 2006.

/s/ electronically signed

ZUBAIR ASLAMY
Attorney for Defendant Reid
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Tempe, Arizona 85282
(480) 968-8700

I hereby certify that a true and correct copy of the foregoing was filed electronically with the court and faxed to the Assistant United States Attorney and mailed to the following this 1st day of June, 2006.

/s/ electronically signed

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